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MOSER LAW FIRM, PC



March 28, 2024

**VIA ECF**

Hon. Natasha C. Merle, USDJ  
United States District Court, Eastern District of New York  
225 Cadman Plaza East Courtroom 2F North  
Brooklyn, NY 11210

Re: *Zaldivar v JANL Inc*, Case No. 23-cv-01434(JMA)(LGD)

Dear Judge Merle:

I represent the plaintiffs in the above referenced matter. Yesterday was the deadline for submission of a Motion for Default Judgement. Unfortunately, we were having difficulties contacting our client.

I therefore respectfully request for an extension of three weeks, until April 18<sup>th</sup>, 2024.

Respectfully submitted,

*Steven J. Moser*

Steven J. Moser

CC: All counsel of record via ECF